

For his Second Defense, Defendant Stokes answers and responds to the numbered paragraphs of Plaintiff's Complaint as follows:

INTRODUCTION

1.

In response to Paragraph 1 of the Complaint, this Defendant admits that Plaintiff has filed this civil action on the grounds alleged and pursuant to the statutes as alleged, but this Defendant denies that he is liable to Plaintiff in any manner and can neither admit nor deny the allegations as to the remaining Defendants for lack of sufficient information upon which to form a belief as to the truth thereof.

JURISDICTION AND VENUE

2.

This Defendant admits the allegations set forth in Paragraph 2 of the Complaint.

3.

This Defendant admits the allegations set forth in Paragraph 3 of the Complaint.

PARTIES

4.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 3 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

5.

This Defendant admits the allegations set forth in Paragraph 5 of the Complaint.

6.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 6 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

7.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 7 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

8.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 8 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

9.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 9 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

10.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 10 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

11.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 11 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

12.

This Defendant admits the allegations set forth in Paragraph 12 of the

Complaint.

13.

This Defendant admits the allegations set forth in Paragraph 13 of the Complaint.

FACTUAL ALLEGATIONS

14.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 14 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

15.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 15 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

16.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 16 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

17.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 17 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

18.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 18 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

19.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 19 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

20.

This Defendant is without knowledge or information sufficient to form a

belief as to the truth of the allegations set forth in paragraph 20 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

21.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 21 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

22.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 22 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

23.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 23 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

24.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 24 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

25.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 25 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

26.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 26 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

27.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 27 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

28.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 28 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

29.

This Defendant admits the allegations set forth in Paragraph 29 of the Complaint.

30.

This Defendant admits the allegations set forth in Paragraph 30 of the Complaint.

31.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 31 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

32.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 32 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

33.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 33 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

34.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 34 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

35.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 35 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

36.

This Defendant is without knowledge or information sufficient to form a

belief as to the truth of the allegations set forth in paragraph 36 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

37.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 37 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

38.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 38 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

39.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 39 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

40.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 40 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

41.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 41 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

42.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 42 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

43.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 43 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

44.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 44 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

45.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 45 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

46.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 46 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

47.

This Defendant is without knowledge or information sufficient to form a

belief as to the truth of the allegations set forth in paragraph 47 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

48.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 48 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

49.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 49 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

50.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 50 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

51.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 51 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

52.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 52 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

53.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 53 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

54.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 54 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

55.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 55 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

56.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 56 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

57.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 57 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

58.

This Defendant is without knowledge or information sufficient to form a

belief as to the truth of the allegations set forth in paragraph 58 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

59.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 59 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

60.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 60 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

61.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 61 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

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This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 62 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

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This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 63 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

64.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 64 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

65.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 65 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

66.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 66 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

67.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 67 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

68.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 68 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

69.

This Defendant is without knowledge or information sufficient to form a

belief as to the truth of the allegations set forth in paragraph 69 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

70.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 70 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

71.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 71 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

72.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 72 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

73.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 73 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

74.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 74 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

75.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 75 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

76.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 76 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

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This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 77 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

78.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 78 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

79.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 79 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

80.

This Defendant is without knowledge or information sufficient to form a

belief as to the truth of the allegations set forth in paragraph 80 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

81.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 81 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

82.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 82 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

83.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 83 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

84.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 84 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

85.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 85 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

86.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 86 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

87.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 87 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

88.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 88 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

89.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 89 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

90.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 90 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

91.

This Defendant is without knowledge or information sufficient to form a

belief as to the truth of the allegations set forth in paragraph 91 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

92.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 92 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

93.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 93 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

94.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 94 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

95.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 95 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

96.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 96 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

97.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 97 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

98.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 98 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

99.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 99 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

100.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 100 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

101.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 101 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

102.

This Defendant denies the allegations set forth in Paragraph 102 of the

Complaint in the form and manner alleged.

103.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 103 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

104.

This Defendant admits the allegations set forth in Paragraph 104 of the Complaint.

105.

This Defendant admits the allegations set forth in Paragraph 105 of the Complaint.

106.

This Defendant denies the allegations set forth in Paragraph 106 of the Complaint in the form and manner alleged.

107.

This Defendant denies the allegations set forth in Paragraph 107 of the Complaint.

108.

This Defendant denies the allegations set forth in Paragraph 108 of the Complaint.

109.

This Defendant denies the allegations set forth in Paragraph 109 of the Complaint in the form and manner alleged.

110.

This Defendant denies the allegations set forth in Paragraph 110 of the Complaint.

111.

This Defendant denies the allegations set forth in Paragraph 111 of the Complaint in the form and manner alleged.

112.

This Defendant denies the allegations set forth in Paragraph 112 of the Complaint.

113.

This Defendant denies the allegations set forth in Paragraph 113 of the Complaint.

114.

This Defendant denies the allegations set forth in Paragraph 114 of the Complaint.

115.

This Defendant denies the allegations set forth in Paragraph 115 of the Complaint.

116.

This Defendant denies the allegations set forth in Paragraph 116 of the Complaint.

117.

This Defendant denies the allegations set forth in Paragraph 117 of the Complaint in the form and manner alleged.

118.

This Defendant denies the allegations set forth in Paragraph 118 of the Complaint in the form and manner alleged.

119.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 119 of the

Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

120.

This Defendant denies the allegations set forth in Paragraph 120 of the Complaint.

121.

This Defendant admits the allegations set forth in Paragraph 121 of the Complaint.

122.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 122 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

123.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 123 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

124.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 124 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

125.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 125 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

126.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 126 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

127.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 127 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

128.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 128 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

129.

This Defendant denies the allegations set forth in Paragraph 129 of the Complaint in the form and manner alleged.

130.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 130 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

131.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 131 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

132.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 132 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

133.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 133 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

134.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 134 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

135.

This Defendant is without knowledge or information sufficient to form a

belief as to the truth of the allegations set forth in paragraph 135 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

136.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 136 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

137.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 137 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

138.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 138 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

139.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 139 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

140.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 140 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

141.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 141 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

142.

This Defendant denies the allegations set forth in paragraph 142 of the Complaint in the form and manner alleged.

143.

This Defendant denies the allegations set forth in Paragraph 143 of the Complaint in the form and manner alleged.

144.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 144 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

145.

This Defendant denies the allegations set forth in paragraph 145 of the Complaint in the form and manner alleged.

146.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 146 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

147.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 147 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

148.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 148 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

149.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 149 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

150.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 150 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

151.

This Defendant is without knowledge or information sufficient to form a

belief as to the truth of the allegations set forth in paragraph 151 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

152.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 152 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

153.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 153 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

154.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 154 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

155.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 155 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

156.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 156 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

COUNT I

FOURTH AMENDMENT – 42 U.S.C. § 1983

(False Arrest)

157.

Defendant incorporates by reference, as if fully set forth herein, the answers and responses previously made to paragraphs 1 through 156 of the Complaint.

158.

This Defendant admits the allegations set forth in paragraph 158 of the Complaint as to him.

159.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 159 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

160.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 160 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

161.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 161 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

162.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 162 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

163.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 163 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

164.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 164 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

165.

This Defendant denies the allegations set forth in paragraph 165 of the Complaint.

166.

This Defendant denies the allegations set forth in paragraph 166 of the Complaint.

167.

This Defendant denies the allegations set forth in paragraph 167 of the Complaint.

168.

In response to paragraph 168 of the Complaint, this Defendant denies the allegations as against him, but can neither admit nor deny the allegations as to the remaining Defendants for lack of sufficient information to form a belief as to the truth thereof.

169.

In response to paragraph 169 of the Complaint, this Defendant denies the allegations as against him, but can neither admit nor deny the allegations as to the remaining Defendants for lack of sufficient information to form a belief as to the truth thereof.

COUNT II

FOURTH AMENDMENT 42 U.S.C. § 1983

(Malicious Prosecution)

170.

Defendant incorporates by reference, as if fully set forth herein, the answers and responses previously made to paragraphs 1 through 156 of the Complaint.

171.

This Defendant admits the allegations set forth in paragraph 171 of the Complaint.

172.

This Defendant denies the allegations set forth in paragraph 172 of the Complaint in the form and manner alleged.

173.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 173 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

174.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 174 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

175.

This Defendant denies the allegations set forth in paragraph 175 of the Complaint in the form and manner alleged.

176.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 176 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

177.

This Defendant denies the allegations set forth in paragraph 177 of the Complaint, and notes that he is not familiar with a person named “Tuggle” in this matter.

178.

This Defendant denies the allegations set forth in paragraph 178 of the Complaint as to him.

179.

This Defendant denies the allegations set forth in paragraph 179 of the Complaint as to him.

180.

This Defendant denies the allegations set forth in paragraph 180 of the Complaint as to him.

181.

This Defendant denies the allegations set forth in paragraph 181 of the Complaint.

182.

This Defendant denies the allegations set forth in paragraph 182 of the Complaint.

183.

This Defendant denies the allegations set forth in paragraph 183 of the Complaint.

COUNT III

FOURTH AMENDMENT – 42 U.S.C. § 1983

(Monell Liability)

184.

Defendant incorporates by reference, as if fully set forth herein, the answers and responses previously made to paragraphs 1 through 156 of the Complaint.

185.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 185 of the Complaint,

and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

186.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 186 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

187.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 187 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

188.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 188 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

189.

This Defendant is without knowledge or information sufficient to form a

belief as to the truth of the allegations set forth in paragraph 189 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

190.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 190 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

191.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 191 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

192.

This Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 192 of the Complaint, and therefore can neither admit nor deny the allegations and hereby puts Plaintiff upon strict proof of same.

193.

This Defendant denies the allegations set forth in paragraph 193 of the Complaint.

194.

This Defendant denies any and all other allegations set forth in the Complaint not expressly admitted herein.

THIRD DEFENSE

Defendant William Stokes is protected by qualified immunity as to all constitutional claims brought pursuant to 42 U.S.C. § 1983 because, at all times relevant hereto, he was performing objectively reasonable discretionary acts within the course and scope of his employment with the Twiggs County Sheriff's Office and did not violate a clearly established federal right of which a reasonable person would have known.

FOURTH DEFENSE

The allegations set forth in the Complaint do not rise to the level of a constitutional deprivation by this Defendant under color of state law and therefore do not support a claim for relief under 42 U.S.C. § 1983.

FIFTH DEFENSE

Plaintiff's claims, in whole or part, are barred by the applicable statute of

limitations.

SIXTH DEFENSE

Defendant raises the defense of insufficiency of service of process.

SEVENTH DEFENSE

Plaintiff's alleged damages, if any, were caused by entities or persons other than this Defendant.

WHEREFORE, having fully answered, this Defendant prays that Plaintiff's Complaint be dismissed, with costs taxed against Plaintiff, and that he has such other and further relief as the Court deems just and proper.

TRIAL BY JURY

IS DEMANDED.

This 9th day of December, 2009.

WILLIAMS, MORRIS & WAYMIRE, LLC

/s/ Terry E. Williams

TERRY E. WILLIAMS

Georgia Bar No. 764330

Bldg. 400, Suite A
4330 South Lee Street
Buford, Georgia 30518
678-541-0790
678-541-0789
terry@wmwlaw.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing DEFENDANT WILLIAM STOKES' ANSWER TO PLAINTIFF'S COMPLAINT upon all parties electronically through the Court's CM/ECF system, as follows:

William J. Atkins
Atkins & Attwood, LLC
6400 Powers Ferry Road, Suite 112
Atlanta, Georgia 30339

This 9th day of December, 2009.

WILLIAMS, MORRIS & WAYMIRE, LLC

/s/ Terry E. Williams

TERRY E. WILLIAMS

Georgia Bar No. 764330

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